Case 1:25-cv-01095 Document 4 Filed 07/14/25 Page 1 of 4

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

Plaintiff,

1:25-cv-1095

v.

YOUTUBE LLC, GOOGLE LLC, and ALPHABET, INC.

Defendants.

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER, OR OTHERWISE RESPOND TO COMPLAINT

Defendants YouTube LLC, Google LLC, and Alphabet, Inc. (collectively, "Defendants"), without waiving any defenses described or referred to in Federal Rule 12, hereby move to extend the time to answer, object to, move, or otherwise respond to Plaintiff's Original Petition (the "Petition") filed on June 6, 2025 in the 3rd Business Court of the State of Texas by Plaintiff Defense Distributed ("Plaintiff") and removed to this Court on July 14, 2025. The current deadline for Defendants to respond to the Petition is July 21, 2025. Defendants seek a 30-day extension up to and including August 20, 2025. In support of this request, Defendants respectfully submit the following:

- 1. Defendants request an extension of time to respond to Plaintiff's Petition to permit Defendants' counsel sufficient time to prepare its response to the Petition.
- 2. Defendants have conferred with Plaintiff, and Plaintiff does not oppose the extension sought herein.
- 3. Defendants have requested this extension prior to the expiration of the original deadline to respond to the Petition.

4. Defendants have not previously filed a motion to extend time to move, answer, or otherwise respond to the Petition, and this motion is made in good faith and not for the purposes of undue delay. The request will not impact any other case deadlines.

In the view of the foregoing, Defendants respectfully request that the court grant this unopposed motion and extend the deadline to move, answer, or otherwise respond to the Petition up to and including August 20, 2025.

[Signature block on next page]

Dated: July 14, 2025 Respectfully submitted,

SCOTT DOUGLASS & MCCONNICO LLP

/s/ Steve Wingard
Steven J. Wingard
Texas Bar No. 00788694
Robyn Hargrove
Texas Bar No. 24031859
Eli Barrish
Texas Bar No. 24144433

303 Colorado Street, Suite 2400 Austin, Texas 78701 Telephone: (512) 495-6300 Facsimile: (512) 474-0731 swingard@scottdoug.com rhargrove@scottdoug.com ebarrish@scottdoug.com

COOLEY LLP

Jonathan Patchen*
Michael A. Rome*
Sharon Song*
Madeleine R. Ahlers*

3 Embarcadero Center, 20th Floor San Francisco, CA 94111 Telephone: (415) 693-2000 Facsimile: (415) 693-2222 jpatchen@cooley.com mrome@cooley.com ssong@cooley.com mahlers@cooley.com *Pro Hac Vice forthcoming

Attorneys for Defendants YouTube LLC, Google LLC, and Alphabet, Inc.

CERTIFICATE OF CONFERENCE

Counsel for Defendants conferred with counsel for Plaintiff, and counsel for Plaintiff indicated that Plaintiff does not oppose the relief sought by this Motion.

/s/ Steve Wingard
Steven J. Wingard

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all counsel of record, as listed below, on July 14, 2025.

VIA E-FILING AND E-MAIL

Chad Flores
Texas Bar No. 24059759
cf@chadflores.law
Flores Law PLLC
917 Franklin Street, Suite 600
Houston, Texas 77002
(713) 364-6640

Counsel for Plaintiff

VIA E-FILING AND E-MAIL

Colleen McKnight
Texas Bar No. 24078976
colleen.mcknight@mcknightlaw.us
McKnight Law PLLC
801 Travis Street Suite 2101, PMB 698
Houston, TX 77002
(713) 487-5645

Counsel for Plaintiff

/s/ Steven J. Wingard
Steven J. Wingard